### **2009 Medicare Managed Care** Conference

# Casework and Compliance Where have we been and where are we going?

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Where have we been?

• January and February 2006 3,500 Complaints Received *Daily* 



November and December 2008
 3,500 Complaints Received Weekly

- May 2006 -- Limited CTM Functionality
  - No HICNs, No plan request capability and No plan closure of complaints
- **May 2009** -- Robust CTM Functionality
  - RPC indicators, improved extract capability, sorting and reports, and viewing of all marketing complaints

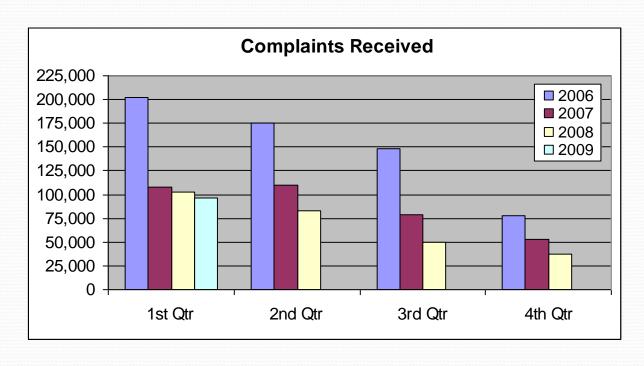


- CTM Expansion to SHIPs
  - Pilot Project began in Spring 2008 Nine States
  - Reduce calls to 1-800 MEDICARE & CMS Regional Offices
- Reciprocal Complaint Sharing With State DOIs and CMS Regions

Where have we been?

- Emerging Kinds of Casework
  - 2006 & 2007
    Premium Withhold and Enrollment Issues
  - 2008 & 2009

Marketing Misrepresentation, BAE Assistance Process, Late Enrollment Penalties, and Enrollment Issues



- Where There's Smoke (Casework) There's Fire (Compliance Issues)
  - Past Focus
    - Fixing Problems
    - Resolving Immediate Access Issues
  - Current Focus
    - Examining the Root Causes
    - Identifying Compliance Issues
    - Holding Plans Accountable for Their Members

Where are we going?

#### Fewer Exclusions

- Last Fall, CMS significantly reduced the number of complaints excluded from plan performance metrics
- Increasing plan accountability for resolving casework

#### New Resolution Timeframes

- Today, 95% of immediate need complaints must be resolved within 2 days
- For 2010, 95% of urgent complaints must be resolved within 7 days and 95% of all others within 30 days

Where are we going?

- What Does a Large Number of Complaints Mean?
  - Plans are not fulfilling contractual obligations
  - Plans' members are not getting the services they paid for and deserve
  - Taxpayer dollars are not being well spent
  - Heightened Congressional concern

- Promoting Your Own Customer Service Hotlines with Your Membership.
- Not Referring Members to 1-800 MEDICARE for Assistance.
- Using the New Enrollments to Establish "Ownership" of Your Members' Issues.
- Anticipating and Preparing for Periods of High Call Volume.

- Fixing Access Issues Immediately!
  - Don't Wait for MARx to be Updated
- Reconcile and Review!
  - Reconcile TRRs and MMRs.
  - Review Batch Completion Reports
  - Don't rely on retro-adjustments
- Submitting Your Enrollments to CMS Frequently
- Downloading Your OEC Enrollments Daily



- Monitoring CTM Complaints and Identifying Trends
  - Analyze data, identify trends, and examine complaint categories
  - Use data as early beacon to an emerging issue
  - Seek technical guidance from your Account Manager early



- Participating in CMS' SHIP Unique ID Program
  - Today, only ½ of the large MAOs and PDPs participate in the program, or have a dedicated SHIP hotline

- Making initial contact with the member when the CTM complaint is received
- "Owning" your members' issues – even when they are outside your control
- Notifying your members when you resolve their complaints
- Proactively reaching out to repeat complainants

## What's In It For Your Company?

- Retaining Members
  - Keeps members happy
- Reducing Probability of Bad PR
  - Keeps CMS happy
  - Keeps Your Board of Directors happy
  - Keeps Congressional Offices happy
- Decreasing Likelihood of Compliance Action
  - Keeps everybody happy

